

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

PRIDE MOBILITY PRODUCTS CORP.

Plaintiff,

V.

PERMOBIL, INC.

Defendant.

PERMOBIL, INC

Counterclaimant,

V.

PRIDE MOBILITY PRODUCTS CORP.

Counterdefendant.

No. 2:13-cv-01999-LDD

JURY DEMANDED

REPLY TO COUNTERCLAIMS

Counterdefendant Pride Mobility Products Corp. (“Pride”) hereby replies to the counterclaims of Counterclaimant Permobil, in accordance with the numbered paragraphs thereof, as follows:

1. Admitted, upon information and belief.
 2. Admitted that Pride is a corporation organized under the laws of Pennsylvania with its principal place of business at 182 Susquehanna Avenue, Exeter, Pennsylvania 18643.
 3. Admitted.
 4. Admitted.
 5. Admitted.

Count I – Non-Infringement of the ‘343 Patent

6. Pride repeats and reaffirms the allegations set forth in paragraphs 1-5 of this
Reply as though fully set forth herein.

7. Denied.

8. Denied.

Count II – Invalidity of the ‘343 Patent

9. Pride repeats and reaffirms the allegations set forth in paragraphs 1-8 of this Reply as though fully set forth herein.

10. Denied.

11. Denied.

Count III – Non-Infringement of the ‘598 Patent

12. Pride repeats and reaffirms the allegations set forth in paragraphs 1-11 of this Reply as though fully set forth herein.

13. Denied.

14. Denied.

Count IV – Invalidity of the ‘598 Patent

15. Pride repeats and reaffirms the allegations set forth in paragraphs 1-14 of this Reply as though fully set forth herein.

16. Denied.

17. Denied.

PRAYER FOR RELIEF

WHEREFORE, Pride requests judgment in its favor on Permobil’s counterclaims, together with appropriate costs and attorney fees.

Date: July 2, 2013

WOODCOCK WASHBURN LLP

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CERTIFICATE OF SERVICE

I, Gary H. Levin, hereby certify that on this 2nd day of July, 2013, I caused a true and correct copy of the foregoing Reply to Counterclaims to be served via CM/ECF on the following:

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